

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This Document Relates to:**

***Strafford County, New Hampshire v.  
Evernorth Health, Inc., et al***, Case No. 1:23-  
op-45006-DAP (N.D. Ohio)

**MDL No. 2804**

**Case No. 17-MD-2804-DAP**

**Judge Dan Aaron Polster**

**PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiff seeks leave to file its Complaint under seal.

Local Rule 5.2 states: “No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents.”

Plaintiff’s Complaint contains information that has been subject to Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendments thereto (ECF #s 441, 1357, 2687, 2688). This information is subject to this Court’s Order Amending Procedures Regarding Redactions and Filing of Briefs

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[Court Information](#) Under Seal (ECF # 1813). Plaintiff respectfully requests to proceed in this manner so there are no inadvertent disclosures of information subject to Protective Orders and to comply with this Court’s orders.

WHEREFORE, Plaintiff respectfully requests the Honorable Court to grant Plaintiff's Motion for Leave to File its Complaint Under Seal.

Dated: June 13, 2023

Respectfully submitted,

/s/ J. Gerard Stranch, IV

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13 2023, a copy of the above and foregoing was electronically filed using the CM/ECF system, which will send a notification to all counsel of record.

/s/ J. Gerard Stranch, IV

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